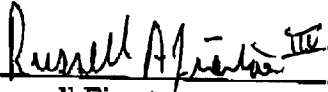


1. I am an officer of the intervenor, Sanitec Industries, Inc. ("SII"). I make this declaration in connection with SII's further response to this Court's show cause order to oppose the motion of plaintiffs, Mildred W. Finch, *et al.* ("Finch"), for leave to file a third amended complaint. I make this declaration based on my personal knowledge.
2. SII is a California corporation incorporated on February 19, 2003 with offices in Sun Valley, California and Washington, DC.
3. SII has never had an office, owned property, solicited business, or sent agents for the purpose of soliciting business into the State of Ohio. SII has not sold or leased products or provided services to any customer in the State of Ohio.
4. SII has no ownership interest in defendants Sanitec Group, Inc. ("Group"), Sanitec, Ltd. ("Limited"), or Guardian Investments LLC ("Guardian"). The individual defendants Stephen Ventre ("Ventre"), Terrance Lee Quatkemeyer a/k/a Terry Quinn, and George Fiorini, have no ownership interest in or other connection to SII.

I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge information and belief.

Dated: November 2, 2004

  
 \_\_\_\_\_  
 Russell Firestone

#3816916